

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CHICAGO GRAPHIC ARTS HEALTH AND)
WELFARE PLAN; ROBERT MILLER and)
JAMES E. MADDEN, in their capacity as)
Trustees of the Chicago Graphic Arts Health)
and Welfare Plan, GRAPHIC)
COMMUNICATIONS CONFERENCE OF THE)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS SUPPLEMENTAL)
RETIREMENT AND DISABILITY FUND;)
GEORGE TEDESCHI, and PAUL)
ROSENBERG, in their capacity as Trustees of)
the GCC/IBT Supplemental Retirement and)
Disability Fund, and CARL J. LOSTRACCO,)
JOHN P. CAPUTO, THOMAS S. GEHR,)
ROBERT J. MUCCIANTI, DENNIS A.)
BETSANES, and DONALD J. ROTOR,)
ANDREW J. GEHR,)**

Plaintiffs,

v.

**UNITECH PREPRESS SOLUTIONS, INC.,)
and ROBERT E. LUDFORD, III, individually.)**

Defendants.

No. 07 C 6287

Judge Gettleman

Magistrate Judge Mason

AFFIDAVIT OF PAUL A. MANCILLAS

STATE OF ILLINOIS)

)

COUNTY OF COOK)

Paul A. Mancillas, being first duly sworn on oath, deposes and states as follows:

1. I am Vice President of Chicago Local 458-M, G.C.C./I.B.T. ("Local 458-M"), Recording Secretary for the G.C.C./I.B.T., District Council No. 4, and a Trustee of the G.C.C./I.B.T. Inter-Local Pension Fund ("Inter-Local") for 2007. My office is located at the Local 458-M's offices at 455 Kehoe Blvd., Suite 101, Carol Stream, IL 60188-5203. This affidavit is submitted in support of plaintiffs' for default and for damages.

default and for damages.

2. My responsibilities for Local 458-M include monitoring the monthly payments owed to the Inter-Local Fund by contributing employers. Unitech Prepress Solutions, Inc. (the "Company"), was a contributing employer to the Inter-Local Fund and according to the collective bargaining agreement between Local 458-M and the Company, and the Company is obligated to withhold amounts from employee's weekly pay checks and remit those amounts monthly to the Inter-Local Fund.

3. According to Local 458-M's records, the Company withheld Inter-Local Pension Fund contributions from beginning April 7, 2007 from through May 20, 2007 and failed to remit those amounts to the Inter-Local Pension Fund.

4. The following amounts are owed to the Inter-Local Pension Fund on behalf of employees identified below. The column on the immediately right of each employees' name indicates the amounts that were unpaid but withheld from employees' wages through mid May 2007. The column on the far right reflects the amounts that should have been withheld in employees' wages but have not been paid to the Inter-Local Fund nor to each employee:

	Amounts held:	Unpaid salary:
Dennis Betsanes	\$691.35	\$152.82
John P. Caputo	\$725.26	\$158.07
Andrew Gehr	\$747.00	\$158.39
Thomas Gehr	\$731.93	\$158.39
Carl J. Lostracco	\$772.78	\$162.69
Robert Muccianti	\$789.16	\$168.16
Donald J. Rotor	\$652.09	\$150.72

5. The amounts owed to the Inter-Local Pension Fund for the period from April 7, through May 20, 2007 are \$5,109.57 which have been deducted from employees' wages but not paid to the Fund and for the period from May 20, 2007 through the end of business, the amount of \$1,109.24 has not yet been remitted to the Fund.

FURTHER AFFIANT SAYETH NOT


Paul Mancillas

Subscribed and sworn to before me
March, 2008.


NOTARY PUBLIC

